

FILED 20 FEB '25 16:06 USDC-ORE

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

UNITED STATES OF AMERICA

6:25-cr- 00073- MTK

v.

INDICTMENT

**JEREMY GALINDO, DANIEL DREWS,
and JOHNATHAN WINDHURST**

**18 U.S.C. §§ 933(a)(1) and (3)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(j)**

Defendants.

Forfeiture Allegations

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1
(Conspiracy to Traffick in Firearms)
(18 U.S.C. §§ 933(a)(1), (a)(3))

1. Beginning in or about December 2023, in the District of Oregon, defendants **JEREMY GALINDO, DANIEL DREWS**, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other to traffick in firearms by knowingly and intentionally shipping, transporting, causing to be transported, and otherwise disposing of one or more firearms to a recipient in or otherwise

affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony.

OBJECT OF THE CONSPIRACY

2. It was the object of the conspiracy to unlawfully access Adult Victim 1's (AV1) vault that contained firearms, steal those firearms, and then sell or transfer the stolen firearms to other individuals, while knowing that the transfer of the firearms to the recipients would constitute a felony.

OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance of the conspiracy, and in order to affect the objects thereof, the co-conspirators committed, or caused to be committed, the following overt acts in the District of Oregon.

4. At some point on or after December 19, 2023, **DREWS** became aware that AV1's vault was open and accessible, as it was previously burglarized by other individuals charged in a separate conspiracy.

5. **DREWS** told **GALINDO** about the vault being open and the guns left remaining therein.

6. **GALINDO** and another unindicted co-conspirator returned to AV1's vault in Bandon, Oregon and stole numerous firearms.

7. **GALINDO** and **DREWS** returned to co-defendant Johnathan Windhurst's house with the stolen firearms. **GALINDO** provided Windhurst with two firearms, loaded up the remaining firearms into a car, and departed.

8. **GALINDO** sold one firearm obtained in the burglary to an uncharged individual who had a felony record.

9. **GALINDO** and others then transported and transferred a significant portion of the stolen firearms to an individual who travelled from out of state to purchase or otherwise obtain the firearms.

All in violation of Title 18, United States Code, Sections 933(a)(1) and (a)(3).

COUNT 2
(Possession of a Stolen Firearm)
(18 U.S.C. § 922(j))

On or about December 30, 2023, in the District of Oregon, defendant **JEREMY GALINDO** knowingly possessed a stolen firearm, to wit: an Unbranded AR, model UAR-C, .223 caliber rifle, which had previously been shipped or transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen,

In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT 3
(Possession of a Stolen Firearm)
(18 U.S.C. § 922(j))

On or about December 23, 2023, in the District of Oregon, defendant **DANIEL DREWS** knowingly possessed a stolen firearm, to wit: a Springfield, model Hellcat pistol, which had previously been shipped or transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen,

In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT 4
(Possession of a Stolen Firearm)
(18 U.S.C. § 922(j))

On or about February 9, 2024, in the District of Oregon, defendant **JOHNATHAN WINDHURST** knowingly possessed a stolen firearm, to wit: a Zastava, 7.62 x 39mm caliber rifle,

which had previously been shipped or transported in interstate or foreign commerce, knowing and having reasonable cause to believe the firearm was stolen,

In violation of Title 18, United States Code, Sections 922(j) and 924(a)(2).

COUNT 5
(Felon in Possession of a Firearm)
(18 U.S.C. § 922(g)(1))

On or about February 9, 2024, in the District of Oregon, defendant **JOHNATHAN WINDHURST**, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, specifically:

- a. Felon in Possession of a Weapon, on or about September 14, 2021, in the State of Oregon, Coos County Case Number 21CR35733; and
- b. Identity Theft, on or about May 12, 2016, in the State of Oregon, Coos County Case Number 16CR07723,

did knowingly and unlawfully possess a firearm, to wit: a Zastava, 7.62 x 39mm caliber rifle, which had previously been transported in interstate or foreign commerce,

In violation of Title 18, United States Code, Section 922(g)(1).

FIRST FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 1 of this Indictment, defendants **DANIEL DREWS** and **JEREMY GALINDO** shall forfeit to the United States pursuant to 18 U.S.C. § 934(a)(1)(A) and (B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the aforesaid violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation.

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SECOND FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 2 of this Indictment, defendant **JEREMY GALINDO** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense, including but not limited to the following: an Unbranded AR, model UAR-C, .223 caliber rifle, with associated ammunition and accessories.

THIRD FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Count 3 of this Indictment, defendant **DANIEL DREWS** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense, including but not limited to the following: A Springfield, model Hellcat pistol, with associated ammunition and accessories.

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FOURTH FORFEITURE ALLEGATION

Upon conviction of one or more of the offenses alleged in Counts 4 or 5 of this Indictment, defendant **JOHNATHAN WINDHURST** shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in or used in the commission of the offense, including but not limited to the following: a Zastava, 7.62 x 39mm caliber rifle, with associated ammunition and accessories.


Dated: February 20, 2025.

A TRUE BILL.

~~OFFICIATING FOREPERSON~~

Presented by:

WILLIAM M. NARUS
Acting United States Attorney



GAVIN W. BRUCE, OSB# 113384
Assistant United States Attorney